

1 Scott E. Gizer, Esq., Nevada Bar No. 12216
2 *sgizer@earlysullivan.com*
3 Sophia S. Lau, Esq., Nevada Bar No. 13365
4 *slau@earlysullivan.com*
5 EARLY SULLIVAN WRIGHT
6 GIZER & McRAE LLP
7 8716 Spanish Ridge Avenue, Suite 105
8 Las Vegas, Nevada 89148
9 Telephone: (702) 331-7593
10 Facsimile: (702) 331-1652

11 Kevin S. Sinclair, NV Bar No. 12277
12 *ksinclair@sinclairbraun.com*
13 SINCLAIR BRAUN LLP
14 16501 Ventura Blvd, Suite 400
15 Encino, California 91436
16 Telephone: (213) 429-6100
17 Facsimile: (213) 429-6101

18 Attorneys for Defendants
19 CHICAGO TITLE INSURANCE COMPANY, and TICOR
20 TITLE OF NEVADA, INC.

21 DESIGNATED LOCAL COUNSEL FOR SERVICE OF
22 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

23 Gary L. Compton, State Bar No. 1652
24 2950 E. Flamingo Road, Suite L
25 Las Vegas, Nevada 89121

26 **UNITED STATES DISTRICT COURT**

27 **DISTRICT OF NEVADA**

28 HSBC BANK USA, N.A.,

Plaintiff,

vs.

FIDELITY NATIONAL TITLE GROUP,
INC. et al.,

Defendants.

Case No.: 2:21-CV-01300-APG-NJK

**STIPULATION AND ORDER TO
EXTEND TIME TO RESPOND TO
COMPLAINT (ECF No. 1)**

FIRST REQUEST

COMES NOW defendants Chicago Title Insurance Company (“Chicago Title”) and Ticor Title of Nevada, Inc. (“Ticor Agency”) (collectively “Defendants”) and plaintiff HSBC Bank USA, National Association (“HSBC”), by and through their respective attorneys of record, which hereby agree and stipulate as follows:

1 1. On July 8, 2021 HSBC filed its complaint in the Eighth Judicial District Court for
2 the State of Nevada;

3 2. On July 8, 2021, Chicago Title removed the instant case to the United States
4 District Court for the State of Nevada (ECF No. 1);

5 3. Ticor Agency's response to HSBC's complaint is currently due on August 11,
6 2021, while Chicago Title's response to HSBC's complaint is currently due on August 12, 2021;

7 4. Counsel for Defendants request a 30-day extension for Ticor Agency (29 days for
8 Chicago Title), through and including Friday, September 10, 2021, for Defendants to file their
9 respective responses to HSBC's complaint to afford Defendants' counsel additional time to
10 review and respond to HSBC's complaint.

11 5. Counsel for HSBC does not oppose the requested extension;

12 6. This is the first request for an extension made by counsel for Defendants, which is
13 made in good faith and not for the purposes of delay.

14 7. This stipulation is entered into without waiving any of Defendants' objections
15 under Fed. R. Civ. P. 12.

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1 **IT IS SO STIPULATED** that Defendants' respective deadlines to respond to the
2 complaint is hereby extended through and including Friday, September 10, 2021.

3 Dated: August 10, 2021

SINCLAIR BRAUN LLP

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5 By: /s/-Kevin S. Sinclair
6 KEVIN S. SINCLAIR
7 Attorneys for Defendants
8 CHICAGO TITLE INSURANCE COMPANY
9 and TICOR TITLE OF NEVADA, INC.

10 Dated: August 10, 2021

WRIGHT FINLAY & ZAK, LLP

11 By: /s/-Christina v. Miller
12 CHRISTINA V. MILLER
13 Attorneys for Plaintiff
14 HSBC BANK USA, NATIONAL
15 ASSOCIATION

16 **IT IS SO ORDERED.**

17 Dated: August 11, 2021

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NANCY J. KOPPE
UNITED STATES MAGISTRATE JUDGE